

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

RESIDENTIAL FUNDING COMPANY, LLC
(F/K/A RESIDENTIAL FUNDING
CORPORATION), et al.,

Defendants.

Civil Action No. 3:11-30035-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

DB STRUCTURED PRODUCTS, INC., et al.,

Defendants.

Civil Action No. 3:11-30039-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

RBS FINANCIAL PRODUCTS INC. (F/K/A
GREENWICH CAPITAL FINANCIAL
PRODUCTS, INC.), et al.,

Defendants.

Civil Action No. 3:11-30044-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

DLJ MORTGAGE CAPITAL, INC., et al.,

Defendants.

Civil Action No. 3:11-30047-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

CREDIT SUISSE FIRST BOSTON MORTGAGE
SECURITIES CORP., et al.,

Defendants.

Civil Action No. 3:11-30048-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., et al.,

Defendants.

Civil Action No. 3:11-30094-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

GOLDMAN SACHS MORTGAGE COMPANY, et
al.,

Defendants.

Civil Action No. 3:11-30126-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

IMPAC FUNDING CORPORATION, et al.,

Defendants.

Civil Action No. 3:11-30127-MAP-KPN

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

HSBC BANK USA, NATIONAL ASSOCIATION,
et al.,

Defendants.

Civil Action No. 3:11-30141-MAP-KPN

**MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY'S NOTICE OF
MOTION FOR ENTRY OF AN AMENDED PROTECTIVE ORDER**

Plaintiff Massachusetts Mutual Life Insurance Company (“MassMutual”) hereby moves for entry of an amended Protective Order in the above-captioned actions (the “Actions”) that reflects the following limited amendments to the Protective Order entered on December 21, 2012:

- An amendment to Paragraph 9(a) to allow disclosure of confidential information, including “Non-Party Borrower Information,” to due diligence firms that have had prior access to the very same information so as to enable them to locate relevant documents. MassMutual also requests an amendment to the definition of “Non-Party Borrower Information” in Paragraph 1(c) to exclude loan numbers, which are not personally identifiable or confidential.
- Replacement of the existing Exhibit A to the Protective Order (Agreement To Be Bound by the Protective Order) with a simplified Exhibit A that numerous Defendants in these Actions, including all corporate Defendants, have previously agreed to in the *Federal Housing Finance Agency* (“FHFA”) actions pending in the Southern District of New York and the District of Connecticut.
- An amendment to Paragraph 9 to allow discovery materials produced in the Actions to be accessed or used in MassMutual’s pending action against Countrywide Financial Corporation and certain Defendants, sent for pre-trial purposes only to the Central District of California, and vice versa.

This Motion should be granted because, as more fully explained in MassMutual’s accompanying Memorandum of Law, the amendments are necessary to facilitate party and third-party discovery and Defendants have no valid objection to them. The Motion is based on this Notice of Motion, the accompanying Memorandum of Law in support thereof and exhibits thereto, the concurrently filed Declaration of Molly Stephens and exhibits thereto, the pleadings and records on file in these actions, any matters of which the Court may take judicial notice, and any further argument as may be presented on this motion.

This Motion is made in conformity with Local Rule 37.1(b). Counsel for MassMutual and Defendants met and conferred beginning on March 30, 2013 regarding MassMutual’s proposed amendments to the Protective Order, and Defendants stated they would not consent to the proposed amendments.

DATED: April 19, 2013

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY

By: John J. Egan

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 19th day of April, 2013.

/s/ John J. Egan

John J. Egan